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June 26, 2020

Honorable Robert D. Drain
United States Bankruptcy Judge
U.S. Bankruptcy Court for the District of New York
2000 Quarropas Street
White Plains, NY 10601-4140

Re: The Official Committee of Unsecured Creditors v. McKesson Corp.
(Adv. Pro. 17-08264);
The Official Committee of Unsecured Creditors v. Pharmacy Systems, LLC
(Adv. Pro. 17-08265); and
The Official Committee of Unsecured Creditors v. McKesson Specialty Care
Distribution Corp. (Adv. Pro. 17-08266)
(collectively, the “Adversary Proceedings”)

Dear Judge Drain:

The McKesson defendants and Plaintiff in the Adversary Proceedings submit this joint request to extend the discovery cutoff deadline and reschedule the pretrial conferences in each of the Adversary Proceedings. The McKesson defendants and Plaintiff in the above-referenced Adversary Proceedings jointly request an extension of the discovery cutoff deadline in the Proceedings from June 30, 2020 until October 23, 2020.

The parties have worked consistently to resolve discovery issues since the Court provided guidance on March 20 and April 1, 2020 regarding McKesson’s request for a three-month cessation of discovery in these Proceedings and instructed the parties to meet and confer over digital searches of documents and search terms (utilizing the third party company, Consilio).

The parties have made a great deal of progress, and almost all issues now appear to be resolved. Subject to entry of the agreed-upon protective order (submitted herewith), McKesson has indicated that using the agreed-upon search terms, it will commence its document production on June 26, 2020, and it anticipates that it will need a month to complete that production. Also,

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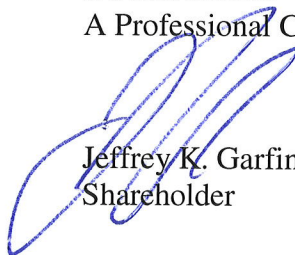
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the parties strongly prefer that depositions in this matter be taken in person and, because witnesses are located across the country, they anticipate logistical problems and delays due to COVID-19.

For the foregoing reasons, the McKesson defendants and Plaintiff jointly request the discovery cut-off be extended through October 23, 3030. The parties further request that the final pretrial conference be scheduled for an acceptable date in November 2020.

Very truly yours,

BUCHALTER
A Professional Corporation



Jeffrey K. Garfinkle
Shareholder

cc: Richard Milin, Esq.
Tracy Klestadt, Esq.